MEMORANDUM

To: All EMS Agencies From: Michael D. Berg

Manager, Regulation and Compliance

Date: February 28, 2005

Regarding: Medication Kit Storage and Security

The *Virginia Emergency Medical Services Regulations* 12 VAC 5-31-520. Storage and security of medications and related supplies, states:

- A. An area used for storage of medications and administration devices and a medication kit used on an EMS vehicle shall comply with requirements established by the Virginia Board of Pharmacy and the applicable drug manufacturer's recommendations for climate-controlled storage.
- B. Medications and medication kits shall be maintained within their expiration date at all times.
- C. Medications and medication kits shall be removed from vehicles and stored in a properly maintained and locked secure area when the vehicle is not in use unless the ambient temperature of the vehicle's interior medication storage compartment is maintained within the climate requirements specified in this section.
- D. An EMS agency shall notify the Office of EMS in writing of any diversion of (i.e., loss or theft) or tampering with any controlled substances, medication delivery devices or other regulated medical devices from an agency facility or vehicle. Notification shall be made within 15 days of the discovery of the occurrence.
- E. An EMS agency shall protect EMS vehicle contents from climate extremes.

The purpose of this memorandum is to clarify several areas of inconsistency and interpretation regarding the above regulations, specifically the storage and security of the medications

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- 1. All medication/medication kits (Shock Trauma/Enhanced/Cardiac /Intermediate/Paramedic) must be stored in a fully enclosed locked compartment when not in use.
 - a. The Virginia Board of Pharmacy note that the IV fluids and assorted administration equipment may be stored in a cabinet and considered secured as long as the "...vehicle is locked when not in use, or if the vehicle is parked within a secured facility." This **only** applies to intravenous fluids and their associated administration equipment.
- 2. The locked compartment is defined as:
 - a. Ambulance Interior locked compartment. If there is exterior access to this compartment it must be through a separate locked door.
 - b. Non-transport first response vehicle
 - i. Rescue Vehicle/Fire Engine Approved locking device attached within the passenger compartment or an exterior compartment, inaccessible by the public.
 - ii. Sedan/Zone Car Approved locking device attached within the passenger compartment or trunk, inaccessible by the public.
 - iii. Utility Vehicle/Van Approved locking device attached within the vehicles interior, inaccessible by the public.
 - c. Approved locking devices shall be of a design that prevents removal and opening of the medication kit. Devices that only secure the medication kit by its handle(s) are not acceptable.
- 3. The Virginia Board of Pharmacy regulations do not permit EMS personnel to posses or carry a personal medication kit or medications for use on patients (this includes any IV fluids or administration equipment).

The Office of EMS remains available to assist agencies and providers in complying with the Virginia Board of Pharmacy Regulations 18 VAC 110-2-10 (July 16, 2003) and the Virginia Emergency Medical Services Regulations 12 VAC 5-31 (January 15, 2003) with regards to medication kits and their storage.